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[ADDITIONAL COUNSEL ON SIGNATURE PAGE]

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

TAD CRANE, individually,	)	Case No: 22-cv-00599-DMR
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	<b>STIPULATION AND ORDER</b>
	)	<b>CONTINUING INITIAL CASE</b>
	)	<b>MANAGEMENT CONFERENCE</b>
UNITED STATES OF AMERICA, a	)	
NATHANIEL WHITE, individually and in his	)	
capacity as an agent for the FEDERAL	)	
BUREAU OF INVESTIGATION,	)	Hon. Donna M. Ryu
	)	
Defendants.	)	

Plaintiff Ted Crane (“Plaintiff”) and Defendants the United States of America and Nathan White<sup>1</sup> (collectively, “Defendants,” and together with Plaintiff, the “Parties”), hereby stipulate with respect to the scheduling of the Initial Case Management Conference in this matter currently set for August 31, 2022 at 1:30 p.m.:

WHEREAS, on January 28, 2022, Plaintiff filed a Complaint in this action;

WHEREAS, on June 14, 2022, Plaintiff filed a First Amended Complaint;

WHEREAS, on August 15, 2022, Plaintiff filed a Second Amended Complaint;

<sup>1</sup> Defendant’s true name is Nathan White, not Nathaniel White as alleged.

1 WHEREAS, the Court has twice *sua sponte* continued the initial case management  
2 conference, first from May 4, 2022 to June 29, 2022, and then from June 29, 2022 to August 31,  
3 2022, because Defendants had not yet been served;

4 WHEREAS, Defendant White accepted service of the Second Amended Complaint via  
5 counsel on August 17, 2022;

6 WHEREAS, Defendant the United States of America was served with the Second  
7 Amended Complaint on August 15 and intends to file a response to that complaint on August 30;

8 WHEREAS, Defendant Crane retained counsel on August 16, 2022 and the parties agree  
9 that good cause exists for counsel to have additional time to prepare for the Initial Case  
10 Management Conference and related events and deadlines;

11 NOW, THEREFORE, having met and conferred, the Parties have agreed that, subject to  
12 the Court's approval, the initial case management conference should be continued to October 5,  
13 2022 at 1:30 p.m., or any date thereafter convenient to the Court's calendar;

14 **IT IS SO STIPULATED.**

15 DATED: August 17, 2022

Respectfully submitted,

16 DELAHUNTY & EDELMAN LLP

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22 UNITED STATES OF AMERICA

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6 LAW OFFICES OF JOHN L. BURRIS

7 By: /s/ James Cook

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19 *Attorneys for Plaintiff Tad Crane*

20 **FILER'S ATTESTATION**

21 The undersigned filer attests that, pursuant to Civil L.R. 5-1(i)(3), concurrence in the  
22 filing of the document has been obtained from the other signatories to this document.

23 By: /s/ William J. Edelman

24 WILLIAM J. EDELMAN

**ORDER**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

The initial case management conference in this matter is vacated and continued to October 5, 2022 at 1:30 p.m. in Oakland – Videoconference Only before Magistrate Judge Donna M. Ryu. Parties shall file a joint case management conference statement by September 28, 2022.

DATED: August 18, 2022

  
\_\_\_\_\_  
HON. DONNA M. RYU  
United States Magistrate Judge